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April 20, 2011

**VIA ECF**

The Honorable Judge Lois Bloom  
United States Magistrate Judge  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Shirley Wrubel, as Trustee of the Sara Hollander Irrevocable Life Insurance Trust v. John Hancock Life Insurance Company, Docket No. 11-cv-01873 (DLI)(LB)*

Dear Judge Bloom:

This firm represents defendant John Hancock Life Insurance Company (“John Hancock”), in the above-referenced action. Pursuant to Your Honor’s Individual Rules and Practices, we write to request an extension of time to file an answer to Plaintiff’s complaint. This case was filed in the New York State Supreme Court, Kings County and John Hancock duly removed this matter to this Court on April 15, 2011. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), John Hancock’s answer is due on April 22, 2011. John Hancock requests a 20-day extension to file its answer, from April 22, 2011 to May 12, 2011, in order for counsel to evaluate Plaintiff’s claims and John Hancock’s defenses to this action. We have attempted to contact Plaintiff’s counsel in this matter twice, and he has not responded to our calls because we believe that he may be out of the office due to the holidays. This is our first request for an extension and there are no other scheduled deadlines effected by this request.

Thank you for your consideration.

Respectfully submitted,

Sean R. Flanagan

cc: Ira S. Lipsius, Esq.